



DEPARTMENT OF FISH AND GAME

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ALAMEDA POINT
SSIC NO. 5090.3



March 8, 2001

Mr. Richard Weissenborn
SW Division, NAVFACENGCOM
1220 Pacific Highway
San Diego, California 92132

Dear Mr. Weissenborn:

Subject: Review of Draft Remedial Investigation Report, IR Site 2,
Alameda Point, Alameda, California, Draft Dated December 4, 2000

As trustee for the State's Natural Resources, the California Department of Fish and Game (DFG) Office of Spill Prevention and Response (OSPR) has completed its review of the "Draft Remedial Investigation (RI) Report, IR Site 2, Alameda Point, California," dated December 4, 2000. The draft document was prepared for the Navy by Neptune and Company, Inc. Per the Federal Facilities Agreement, we reviewed the document.

Background

Alameda Point was formerly called Naval Air Station (NAS) Alameda. It is on Alameda Island, at the western end of the City of Alameda in Alameda County, and along the eastern side of San Francisco Bay. This document addresses two sites, the West Beach Landfill and the West Beach Landfill Wetland.

The West Beach Landfill (WBL) occupies approximately 77 acres. It was created from dredged material in 1936 and used historically for the disposal of waste material from the NAS Alameda and other naval facilities in the San Francisco Bay area. From 1936 to the early 1970's, an estimated 30,000 pounds per month of solid and liquid wastes were disposed in the WBL. Disposed wastes may have contained PCBs, radium, pesticides, asbestos, mercury, waste oils, inert ordinance, and infectious waste from the Oak Knoll Naval Hospital. From about 1937 to the early 1970's waste oils were released directly on the roads that traverse the landfill. Two unlined oil sumps at the WBL were used for waste oils that were not reclaimed or sold. In 1978, waste disposal at the WBL was terminated. Various activities associated with Class II landfill closures were implemented. In 1986, the area was graded to eliminate ponding, and earthen berms were constructed around the WBL.

The West Beach Landfill Wetland (WBLW) occupies approximately 33 acres in the southwest corner of the WBL. It was created in the 1980's by excavating the dredge fill down to

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the water table and using this material as landfill cover. There are two ponds at the WBLW (northern pond and southern pond). A 36-inch culvert connects the northern pond to the San Francisco Bay.

The DFG has been asked to provide a review and comments on the report. We offer the following remarks:

General Comments

1. The DFG is in general concurrence with the detailed review provided by Dr. James Polisini of the Department of Toxic Substances Control (DTSC) on January 24, 2001. The DFG has only a few new comments on the above document beyond those expressed by DTSC.
2. Page 7-50, section 7.3.2.4: The hazard quotient (HQ) calculation was checked and found to be arithmetically correct. However, equation 7-1 (page 7-18) should be:

$$\text{Dose} = \frac{[(\text{Conc}_{\text{soil}} \cdot \text{SoilDI}) + (\text{Conc}_{\text{water}} \cdot \text{WaterDI}) + (\text{Conc}_{\text{mammal}} \cdot \text{MammalDI})] \cdot \text{SUF}}{\text{Body Weight}}$$

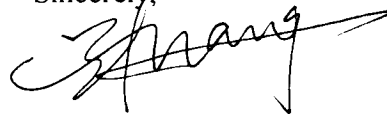
3. Page 7-50, section 7.3.2.4: In describing the method by which risk estimates were derived, there is no discussion of the additivity of the HQs or the calculation of a hazard index (HI). In estimating the total risk to a receptor from all the chemicals to which it may be exposed, the individual HQs from each chemical are added together, and the resulting HI is used as an index of the potential risk. Receptors with an HI less than 1.0 are generally thought to be at minimal, if any, risk. HIs greater than 1.0 require further evaluation.
4. Page 4-11, section 4.1.2: After reviewing the report, the DFG does not agree with soil chemical results of organic constituents being compared to "ambient" concentrations for the selection of contaminants of concern (COCs). We recommend the detected organic COCs be carried through the risk assessment to provide the risk managers with an estimate of the risk and hazard.
5. Page 7-2, section 7.2: At Parcel E, Hunters Point Shipyard, the U.S. Navy, with concurrence of the regulators, uses soil concentrations back-calculated from the Toxicity Reference Values by USEPA Region 9 Biological Technical Assistance Group as the protective levels. Please provide an explanation of why this approach was not used for ecological screening levels at IR Site 2. The DFG has not had the opportunity to review the Los Alamos National Laboratory ecological screening levels.
6. Page 7-7, section 7.3: The DFG does not agree with the sentence in this section which states: "... inhalation and dermal contact with potential contaminants were not considered". A

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more accurate statement would be that the contribution from these pathways is unknown but could be significant for those receptors that spend time in burrows. The text should be revised to reflect this uncertainty.

The DFG appreciated the opportunity to review the document. If you have any questions regarding this review or require further details, please contact me at (916) 324-9805, or by e-mail at chuang@ospr.dfg.ca.gov.

Sincerely,



Charlie Huang, Ph.D.
Associate Toxicologist
Scientific Division
Office of Spill Prevention and Response

Reviewer: Annie Bellamy
Staff Service Analyst

cc: Mr. Ned Black, Ph.D.
U.S. EPA Region IX

Mr. Brad Job
California Regional Water Quality Control Board
San Francisco Bay Region

Mr. James Polisini, Ph.D.
Department of Toxic Substances Control

Ms. Laurie Sullivan
NOAA Coastal Resources Coordinator
U.S. EPA Region 9 (SFD-8-1)

Mr. James Haas
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